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### UNITED STATES DISTRICT COURT

### WESTERN DISTRICT OF WASHINGTON AT SEATTLE

UNIVERSAL INSPECTION GROUP, LLC, a Nevada limited liability company,

Plaintiff,

VS.

ALEC B. ANGUS and LALINE ANGUS, and their marital community; and INTEGRA INSPECTION GROUP, LLC, a Washington limited liability company,

No. 2:07-cv-01965-JLR

AFFIDAVIT OF JULIE K. FOWLER IN SUPPORT OF DEFENDANTS RESPONSE TO ORDER TO SHOW CAUSE RE: SANCTIONS

Defendants.

My name is Julie K. Fowler. I am over 18 years of age, am not a party to this lawsuit, am competent to testify herein and make this affidavit from personal knowledge and belief.

I am the attorney for Defendants. The attached correspondence was received by me via email from Vic S. Lam and printed under my direction and control and it is a true and accurate printout of the original. This record is listed as Exhibit A (consisting of 3 pages) in Defendants Brief in Opposition to Sanctions and is incorporated by reference therein.

The attached Universal Inspection Group Limited Liability Company Charter dated December 27, 2006 provided to me directly by Universal Inspection Group LLC was copied under my direction and control and it is a true and accurate copy of the original. This record is listed as Exhibit B in Defendants Brief in Opposition to Sanctions and is incorporated by reference therein. The records attached hereto, were made in the regular course of business, at or near the time of the act, conditions or events described and were made by persons with personal knowledge of those events.

AFFIDAVIT OF JULIE K. FOWLER IN SUPPORT OF DEFENDANTS RESPONSE TO ORDER TO SHOW CAUSE RE: SANCTIONS - 1

Law Office of Julie K. Fowler, P.S. 365 118<sup>th</sup> Avenue SE, Ste 200 Bellevue, WA 98005 (425) 990-9975 1

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The undersigned declares under penalty of perjury according to the laws of the State of Washington that the contents of this Declaration are true and correct.

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DATED this 22<sup>nd</sup> day of February 2008

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LAW OFFICE OF JULIE K. FOWLER, P.S.

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/s/ Julie K. Fowler, WSBA No. 30108 Attorney for Respondents Alec B. Angus, LaLine Angus, and Integra Inspection Group, LLC

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**CERTIFICATE OF SERVICE** 

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I hereby certify that on February 22, 2008, I presented the Affidavit of Julie K. Fowler in Support of Defendants Response to Order to Show Cause Re: Sanctions for filing and uploading to the CM/ECF system which will send notification of such filing to the following person:

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Vic S. Lam Law Offices of Vic S. Lam, P.S. 701 Fifth Avenue, Suite 4200 Seattle, WA 98104

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Dated this 22<sup>nd</sup> day of February 2008

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LAW OFFICE OF JULIE K. FOWLER, P.S.

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/s/ Julie K. Fowler, WSBA No. 30108 Attorney for Respondents Alec B. Angus, LaLine Angus,

18

and Integra Inspection Group, LLC

19 20

365 118<sup>th</sup> Avenue SE, Ste 200 Bellevue, WA 98005 Ph: (425) 990-9975 Fx: (425) 451-2687

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Email: Julie@juliefowlerlaw.com

22

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24

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AFFIDAVIT OF JULIE K. FOWLER IN SUPPORT OF DEFENDANTS RESPONSE TO ORDER TO SHOW CAUSE RE: SANCTIONS - 2

Law Office of Julie K. Fowler, P.S. 365 118th Avenue SE, Ste 200 Bellevue, WA 98005 (425) 990-9975

## Law Offices Of Vic S. Lam PS

January 3, 2008

# VIA ECF-REGISTERED EMAIL julie@juliefowlerlaw.com

Ms. Julie Fowler, Esq. Law Office of Julie Fowler, P.S. 365 118th Avenue SE, Ste 200 Bellevue, WA 98005

RE: UNIVERSAL INSPECTION GROUP LLC V. ANGUS, ET AL. U.S. District Court, Western Dist. of WA, Case No. C07-1965 JLR

## NOTICE OF INTENTION TO MOVE FOR ENTRY OF DEFAULT

Dear Ms. Fowler:

Pursuant to Local Rule 55(a), you and your clients are hereby notified of Plaintiff Universal Inspection Group LLC's intention to move for entry of default without further notice on January 10, 2008.

Very truly yours,

Vic S. Lam

VSL:all

cc: Client

## Julie Fowler

From: Sent: Vic Lam [vicslam@gmail.com] Friday, January 04, 2008 12:38 PM

To:

Julie Fowler

Subject:

Re: UIG v. Angus, et al.

Dear Ms. Fowler:

I was giving you notice of my client's intention to obtain entry of default without further notice on January 10, 2008. Please file your clients' answer before January 10, 2008 so that I do not have to do that. You have essentially gotten an additional 10 days to file the answer. Your clients' motion for extension of time was improperly noted and is improper in other respects as well. As a practical matter, you need to file an answer as soon as possible so that the next court-imposed deadline (February 4, 2008) will not be affected too much by the delay. Let us not waste the court's time and our clients' money filing unnecessary motions or litigating unnecessary issues. Let us try to resolve the parties' disputes expeditiously.

I look forward to working with you in this case.

Very truly yours,

Vic Lam

--

Law Offices of Vic S. Lam P.S. Columbia Center 701 Fifth Avenue, Suite 4200 Seattle, WA 98104 Tel. (206) 224-3788 Fax (206) 338-2117

This e-mail and its attachment(s) contain information from the Law Offices of Vic S. Lam, P.S. which is confidential or privileged. The information is intended to be for the use of the individual or entity named as the recipient only. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this e-mail in error, please notify us immediately so that we can make appropriate arrangements.

On 1/3/08, Julie Fowler < julie@juliefowlerlaw.com > wrote:

You are doing this despite receiving my Motion for Extension of Time to file an Answer?

Julie K. Fowler

Law Office of Julie K. Fowler, P.S.

365 118th Avenue SE, Ste 200

 Page 5 of 6 A - 3

Bellevue, WA 98005

(425) 990-9975

www.juliefowlerlaw.com

From: Vic Lam [mailto:vicslam@gmail.com]
Sent: Thursday, January 03, 2008 4:45 PM

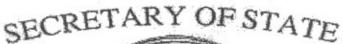
To: Julie Fowler

Subject: UIG v. Angus, et al.

Attached please find Plaintiff's Notice of Intention to Move for Entry of Default.

Law Offices of Vic S. Lam P.S. Columbia Center 701 Fifth Avenue, Suite 4200 Seattle, WA 98104 Tel. (206) 224-3788 Fax (206) 338-2117

This e-mail and its attachment(s) contain information from the Law Offices of Vic S. Lam, P.S. which is confidential or privileged. The information is intended to be for the use of the individual or entity named as the recipient only. If you are not the intended recipient, be aware that any disclosure, copying, distribution or use of the contents of this information is prohibited. If you have received this e-mail in error, please notify us immediately so that we can make appropriate arrangements.







I, DEAN HELLER, the Nevada Secretary of State, do hereby certify that UNIVERSAL INSPECTION GROUP, LLC did on December 27, 2006, file in this office the Articles of Organization for a Limited Liability Company, that said Articles of Organization are now on file and of record in the office of the Nevada Secretary of State, and further, that said Articles contain all the provisions required by the laws governing Limited Liability Companies in the State of Nevada.

LIMITED LIABILITY COMPANY CHARTER

IN WITNESS WHEREOF, I have hereunto set my hand and affixed the Great Seal of State, at my office on December 27, 2006.

Dear Heller

DEAN HELLER Secretary of State

Ву

Certification Clerk

West Con La

Ex B